

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NEW YORK

BLACK LOVE RESISTS IN THE RUST, *et al.*,
individually and on behalf of a class of all others
similarly situated,

Plaintiffs,

v.

CITY OF BUFFALO, N.Y., *et al.*,

Defendants.

No. 1:18-cv-00719-CCR

**NOTICE OF MOTION TO EXPEDITE HEARING ON MOTION FOR LEAVE
TO TAKE THE DEPOSITION OF THE BUFFALO POLICE BENEVOLENT
ASSOCIATION**

PLEASE TAKE NOTICE that Plaintiffs, by and through their undersigned attorneys, hereby move pursuant to Local Rule 7(d)(1) to expedite consideration of their motion for leave to take the deposition of the Buffalo Police Benevolent Association.

PLEASE TAKE FURTHER NOTICE that, as set forth in the Declaration of Matthew Parham dated December 11, 2023, Plaintiffs seek to expedite the motion so that the subpoena for the additional deposition can be served before the close of fact discovery on January 4, 2024. Plaintiffs request that answering papers for the motion be due December 18, 2023, reply papers be due December 21, 2023, and the motion be made returnable thereafter on a date to be determined by the Court.

Dated: December 11 2023
Buffalo, New York

Respectfully Submitted,

/s/ Matthew A. Parham

Matthew A. Parham
WESTERN NEW YORK LAW CENTER
37 Franklin Street, Suite 210
Buffalo, NY 14202
Tel: 716-828-8422
mparham@wnylc.com

Claudia Wilner
Anjana Malhotra
Edward Krugman
NATIONAL CENTER FOR LAW AND
ECONOMIC JUSTICE
50 Broadway, Suite 1500
New York, NY 10004
Tel: 212-633-6967
wilner@nclej.org
malhotra@nclej.org
krugman@nclej.org

A. Chinyere Ezie
Baher Azmy
CENTER FOR CONSTITUTIONAL
RIGHTS
666 Broadway, 7th Floor
New York, NY 10012
Tel/Fax: 212-614-6464
cezie@ccrjustice.org
bazmy@ccrjustice.org

Jordan Scott Joachim
Christine Nelson
COVINGTON & BURLING, LLP
620 Eighth Ave., Suite 4029
New York, NY 10018
Tel: 212-841-1000
Fax: 212-841-1010
jjoachim@cov.com
cnelson@cov.com

Counsel for Plaintiff
s

CERTIFICATE OF SERVICE

I hereby certify that on December 11, 2023, I filed the foregoing Notice of Motion to Expedite Hearing on Motion for Leave to Take the Deposition of the Buffalo Police Benevolent Association dated December 11, 2023, and the proposed order granting the motion, with the Clerk of the District Court using the CM/ECF system, which would then electronically notify all counsel registered through the CM/ECF system.

Dated: December 11, 2023
Buffalo, New York

/s/ Matthew A. Parham

Matthew A. Parham